

Honorable Marsha J. Pechman

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON AT SEATTLE

NORTHSHORE SHEET METAL,  
INC.,

Plaintiff,

v.

SHEET METAL WORKERS  
INTERNATIONAL ASSOCIATION,  
LOCAL 66,

Defendant.

Case No. 2:15-cv-01349 MJP

***SUPPLEMENTAL DECLARATION OF  
CHRISTOPHER L. HILGENFELD IN  
SUPPORT OF PLAINTIFF'S MOTION TO  
QUASH AND/OR MODIFY SUBPOENAS  
DUCES TECUM***

**Noted on Motion Calendar: January 8, 2016**

I, CHRISTOPHER L. HILGENFELD, declare as follows:

1. I am over the age of eighteen (18) years and I am competent to testify if called upon to do so.

2. I am an attorney at Davis Grimm Payne & Marra, counsel of record for Plaintiff Northshore Sheet Metal, Inc. ("Northshore" or "Defendant"), admitted to practice in the U.S. District Court, Western District of Washington. I am the lead attorney representing Northshore Sheet Metal, Inc. in the above-captioned matter, and I make this declaration based upon my personal knowledge and review of the files and records herein.

*Supplemental Declaration of Hilgenfeld re  
Plaintiff's Motion to Quash and/or Modify  
Subpoenas - Page 1  
Case No. 15-cv-01349 MJP*

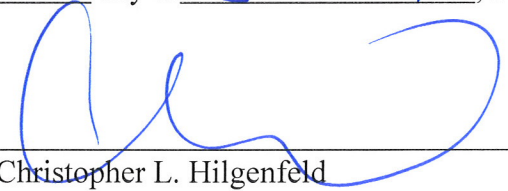
**DAVIS GRIMM PAYNE & MARRA**  
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Seattle, WA 98104  
Ph. (206) 447-0182 • Fax: (206) 622-9927

1           3.       Attached hereto as **Exhibit 7** is a true and correct copy of the Objection to  
2 Subpoena to Produce Documents, Information, or Objects or to Permit Inspection of  
3 Premises in a Civil Action, dated November 30, 2015, and submitted by GLY Construction  
4 to Ms. Burnham with regard to the subpoena duces tecum issued by Defendant to GLY  
5 Construction.

6           4.       Attached hereto as **Exhibit 8** are the letters presented by Plaintiff to  
7 Mortenson Construction, Inc., Lease Crutcher Lewis, and GLY Construction, dated  
8 December 4, 2014, (general contractors subpoenaed by Defendant) after Defendant refused  
9 to allow a brief time for Plaintiff to obtain a protective order related to the documents  
10 sought.

11           I declare under penalty of perjury under the laws of the State of Washington and the  
12 United States that the foregoing statements are true and accurate.

13           Dated at Seattle, Washington this 8 day of JANUARY, 2016.

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18 Christopher L. Hilgenfeld  
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